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April 30, 1993

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APR 30 1993

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Petition for Rule Making  
Amendment of Section 73.202(b)  
Table of Allotments  
FM Broadcast Stations  
(Kings Beach, California)

Dear Ms. Searcy:

Transmitted herewith on behalf of Kidd Communications, the permittee of KBCH-FM, Kings Beach, California is an original and four copies of its petition for rule making to amend the FM Table of Allotments for Kings Beach, California. This petition is respectfully directed to the Chief, Allocations Branch.

Should any questions arise concerning this matter, please contact this office directly.

Sincerely,

  
John F. Garziglia

Enclosure

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

APR 30 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Amendment of Section 73.202(b) )

Table of Allotments )

FM Broadcast Stations )

(Kings Beach, California) )

RM \_\_\_\_\_

To: Chief, Allocations Branch

PETITION FOR RULE MAKING

Kidd Communications, the permittee of KBCH-FM, Kings Beach, California, by its attorneys, pursuant to Section 1.401 and Section 1.420(g)(3) of the Commission's rules, respectfully submits its petition for rule making to amend the FM Table of Allotments, Section 73.202(b) of the Commission's rules, as follows:

Present

Proposed

Kings Beach, California 299C3

299C2<sup>1</sup>

In support thereof, the following is submitted:

1. This petition proposes the allotment of Channel 299C2 to Kings Beach, California in lieu of Channel 299C3, and a modification of the construction permit of KBCH-FM, Kings Beach, California to specify operation on Channel 299C2. Attached to this petition is an engineering statement prepared by the petitioner demonstrating that the proposed Channel 299C2 allotment may be made to Kings Beach in accord with all applicable spacings.

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<sup>1</sup> The coordinates for the Channel 299C2 proposed allotment to Kings Beach, California are 39° 17' 30" North Latitude, 119° 40' 35" West Longitude.

2. As shown in the engineering statement, the proposed site is 31.5 kilometers from the most distant boundary of Kings Beach. Because of this distance and the requirement that the petitioner demonstrate that city-grade coverage will be achieved to Kings Beach, California from the proposed allotment, the petitioner has prepared an engineering showing demonstrating the availability of such coverage from the petitioner's chosen transmitter site. The petitioner proposes an overall center of radiation above average terrain of 952.2 meters with an equivalent effective radiated power of .8 kilowatts from the proposed site, which is the equivalent maximum for Class C2 facilities. On the radial toward Kings Beach (258°), the center of radiation above average terrain is 1002.4 meters. From that proposed height and with the proposed effective radiated power, the distance to the 70 dBu city-grade contour is 31.8 kilometers. Since this exceeds the distance to the most distant part of the Kings Beach community limits by more than .3 kilometers, it is demonstrated that the city-grade coverage requirement of the Commission's rules and policies are met in order to grant the upgrade requested.

3. It is well established that there is a limited exception to the allotment policy of predicting city-grade coverage based upon the assumption of uniform terrain for an existing licensee seeking to upgrade its facility at a specific site that is available to it. Under such circumstances, the petitioner can establish city-grade coverage over the community of license based

upon an analysis of the terrain characteristics along specific radials. See Woodstock and Broadway, Virginia, 3 FCC Rcd 6398 (1988). See also Sonora, California, 6 FCC Rcd 6042 (1991) for an upgrade, the Commission permits use of actual terrain data along a specific radial toward the principal city so that the range of the signal toward the city can be determined.

4. This proposal to upgrade KBCH-FM to Channel 299C2 will provide expanded service to the areas and populations surrounding Kings Beach, California. Upon a grant of the requested channel allotment, an application seeking a modification in facilities in accord with that allotment will be promptly filed, and when such application is granted, the facilities will be promptly constructed and placed on the air.

WHEREFORE, for the reasons above, the allotment of Channel 299C2 in lieu of Channel 299C3 to Kings Beach, California, and a modification of the KBCH-FM, Kings Beach, California construction permit to specify operation on Channel 299C2, is respectfully requested.

Respectfully submitted,

KIDD COMMUNICATIONS

By:

  
John F. Garziguia  
Its Attorney

Pepper & Corazzini  
1776 K Street, N.W., Suite 200  
Washington, D.C. 20554  
(202) 296-0600  
April 30, 1993

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## Engineering Statement

Kidd Communications, permittee of KBCH-FM, Kings Beach, California proposes to upgrade on the same channel from Channel 299C3 to Channel 299C2.

A transmitter site search was conducted in Western Nevada to locate a suitable site which would be close enough to Kings Beach to provide a 70 dbu contour over the entire city of license, and also a site which would be far enough away from Sacramento to clear KXOA-FM, Channel 300B by 169 kilometers or 105 miles.

After a diligent search was conducted, a site which meets both criteria was found. The following is the pertinent information on said site.

- 1) Coordinates are; Latitude 39 17 30  
Longitude 119 40 35
- 2) Ground Level; 2164 meters above mean sea level

Several height/power combinations were performed to provide the best city grade coverage over Kings Beach. The following height/power combination provides one hundred per cent city grade coverage over Kings Beach.

- |    |   |              |
|----|---|--------------|
| 1) | Center of radiation above ground level    | 457.2 meters |
|    | plus meters above mean sea level          | 2164 meters  |
|    | center of radiation above mean sea level  | 2621 meters  |
| 2) | Center of radiation above average terrain | 952.2 meters |
| 3) | Proposed ERP                              | .8 KW        |

The radial to Kings Beach from this site is 258 degrees. The height above average terrain along the 258 degree radial is 1002.4 meters. The distance to the 70 dbu city grade contour along the 258 degree radial is 31.8 kilometers.

The distance to the most westerly portion of Kings Beach, from the proposed site is 31.5 kilometers. Therefore, with 31.8 kilometers of 70 dbu coverage towards Kings Beach, this site meets and exceeds the city grade coverage requirement with a .3 kilometer margin to spare.

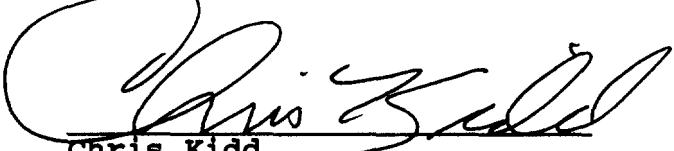
The actual distance from the proposed new site to KXOA, Channel 300B is 169.17 kilometers or 105.07 miles. The required distance 169 kilometers. Therefore, there is a margin to spare of .17 kilometers.

In some data base programs, Channel 300A for Fallon, Nevada appears. Channel 267A was assigned to Fallon, Nevada and although Channel 300A was proposed, it was never assigned to Fallon, Nevada.

Please be aware of this old information that may be in the FCC data base that is no longer valid.

There are no I.F. Relationships to consider. All other adjacent and co-channels are at much greater distances than the close distance of KXOA, Channel 300B.

I, Chris W. Kidd, do hereby certify that the foregoing facts stated in this proposed rule making for a Class C2 for KBCH-FM are true and correct.

  
Chris Kidd  
Owner: Kidd Communications

4-28-93  
Date

02-05-1993

EXHIBIT II ALLOCATION CONTOUR MILEAGE

FMCONT (C)

CH# 299C2 - 107.7 MHz KBCH\_FM

kbch

INTERFERENCE CHECKS WITH XXXX, KINGS BEACH, CA at N. LAT. 39 17 30 W. LNG. 119 40 35

PWR = .8 kW H.A.A.T. = 932 M C.O.R. = 2621 M AMSL

Protected F(50-50) 60 dBu = 52.24 km

F(50-10) 40 dBu = 124.99 54 dBu = 77.47 80 dBu = 15.96 100 dBu = 1.95

F(50-10) 37 dBu = 135.96 51 dBu = 87.33 77 dBu = 20.48 97 dBu = 2.72

F(50-10) 34 dBu = 147.01 48 dBu = 97.25 74 dBu = 25.36 94 dBu = 3.71

CH#	CALL	TYPE	* IN *	* OUT *	BEARING	DISTANCE	LAT.	PWR(kW)	INT(km)	PRO(km)
CITY	STATE	LICENSEE			<---		LNG.	HAAT(M)	COR(M)	FILE #
298A	KMAT.C	CP CN	106.0 R	30.5 M	219.9	136.46 km	38 20 53	1.25	36.39	24.26
Sutter Creek	CA	Susan E. Turgetto			39.9	84.79 Mi	120 41 00	157.0	697	BPH850711MP
298B	KPPL	LI CN	169.0 R	60.3 M	269.9	229.27 km	39 17 17	28.00	76.09	64.17
Colusa	CA	Affinity Communications, I			89.9	142.46 Mi	122 20 02	193.0	410	BLH860925KB
299C3	KBCHFM	AP CN	177.0 R	-159.0 M	277.6	18.01 km	39 18 47	0.23	103.93	39.21
Kings Beach	CA	Kidd Communications			97.6	11.19 Mi	119 53 00	879.0	2962	BMPH9205121C
FCC Comment > From Channel 299A per D89-449-Amended 920625										
299A	KBCHFM	CPM CN	166.0 R	-131.7 M	264.5	34.34 km	39 15 43	0.75	71.59	24.01
Kings Beach	CA	Kidd Communications			84.5	21.34 Mi	120 04 21	199.0	2265	BMPH8908151C
FCC Comment > *To Channel 299C3 per D89-449										
299A	KXDE.C	CP CN	166.0 R	58.1 M	197.6	224.05 km	37 22 05	3.00	75.91	24.22
Merced	CA	John Neuhooff			17.6	139.22 Mi	120 27 10	100.0	174	BPH880301MY
299B	KSOL	LI CN	241.0 R	58.3 M	233.5	299.32 km	37 41 20	8.90	126.31	65.82
San Mateo	CA	Intercontinental Radio, In			53.5	185.99 Mi	122 26 07	354.0	412	BLH860414KF
299B	KSOL.A	AP CN	241.0 R	58.3 M	233.5	299.32 km	37 41 20	8.90	126.31	65.82
San Mateo	CA	Intercontinental Radio, In			53.5	185.99 Mi	122 26 07	354.0	412	BMLH920716KA
FCC Comment > RCAGL appears to be incorrect for the RCAMSL										
299C3	ALOPEN	AL N	177.0 R	-159.0 M	277.9	18.02 km	39 18 50	25.00	113.63	39.08
Kings Beach	CA	88-449			97.9	11.20 Mi	119 53 00	100.0	0	
FCC Comment > Site restricted-Effective 08-30-91-Reserved for KBCHFM per D89-449										
300B	KXOAFM	LI CN	169.0 R	0.2 M	247.6	169.17 km	38 42 38	50.00	73.84	61.08
Sacramento	CA	The Brown Organization			67.6	105.12 Mi	121 28 54	123.0	137	BLH850716KA

i.f. RELATIONSHIPS: NONE FOUND



N. Lat. 39 17 30 W. Lng. 119 40 35

EXHIBIT II CONTINUED/MILEAGE/KILOMETER

Interference to & from Ch# 299C2 - 107.7 MHz. XXXX

Pwr= .8 H.A.A.T.= 932 M \* In \* \* Out \* Azi. Dist.

KBCH-FM1

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298A KMAT.C Sutter Creek CA CP 106.0 R 30.5 M 219.9 136.46

298B KPPL Colusa CA LI 169.0 R 60.3 M 269.9 229.27

299C3>KBCHFM Kings Beach CA AP 177.0 R -159.0 M 277.6 18.01

299A >KBCHFM Kings Beach CA CPM 166.0 R -131.7 M 264.5 34.34

299A KXDE.C Merced CA CP 166.0 R 58.1 M 197.6 224.05

299B KSOL San Mateo CA LI 241.0 R 58.3 M 233.5 299.32

299B >KSOL.A San Mateo CA AP 241.0 R 58.3 M 233.5 299.32

299C3>ALOPEN Kings Beach CA AL 177.0 R -159.0 M 277.9 18.02

300B KXOAFM Sacramento CA LI 169.0 R 0.2 M 247.6 169.17

i.f. -----> None found

#####

Command ?

Predicted Signal Contours:

# EXHIBIT III PREDICTED SIGNAL CONTOURS

39 17 30 -  
119 40 35 -

## KBCH-FM1

ERP = .8 kW, -969 dBk FM - 2-6 Tables

Radial HAAT kW dBk Field 60 dBu.5 70 dBu.5

0 Degr.	707.0M	0.800	-0.969	1.000	46.2	26.5
10 Degr.	647.2M	0.800	-0.969	1.000	44.2	25.4
20 Degr.	679.8M	0.800	-0.969	1.000	45.3	26.0
30 Degr.	695.5M	0.800	-0.969	1.000	45.8	26.3
40 Degr.	754.3M	0.800	-0.969	1.000	47.7	27.4
50 Degr.	713.3M	0.800	-0.969	1.000	46.4	26.6
60 Degr.	870.9M	0.800	-0.969	1.000	50.9	29.5
70 Degr.	1041.3M	0.800	-0.969	1.000	54.3	32.5
80 Degr.	1091.1M	0.800	-0.969	1.000	55.2	33.3
90 Degr.	1114.3M	0.800	-0.969	1.000	55.6	33.7
100 Degr.	1136.9M	0.800	-0.969	1.000	56.0	34.1
110 Degr.	1157.5M	0.800	-0.969	1.000	56.3	34.4
120 Degr.	1140.6M	0.800	-0.969	1.000	56.0	34.1
130 Degr.	1141.2M	0.800	-0.969	1.000	56.0	34.1
140 Degr.	1128.0M	0.800	-0.969	1.000	55.8	33.9
150 Degr.	1081.9M	0.800	-0.969	1.000	55.1	33.2
160 Degr.	1036.5M	0.800	-0.969	1.000	54.3	32.4
170 Degr.	1049.1M	0.800	-0.969	1.000	54.5	32.6
180 Degr.	1054.5M	0.800	-0.969	1.000	54.6	32.7
190 Degr.	1044.1M	0.800	-0.969	1.000	54.4	32.5
200 Degr.	959.4M	0.800	-0.969	1.000	52.8	31.0
210 Degr.	906.3M	0.800	-0.969	1.000	51.7	30.1
220 Degr.	848.4M	0.800	-0.969	1.000	50.3	29.1
230 Degr.	857.8M	0.800	-0.969	1.000	50.6	29.2
240 Degr.	939.4M	0.800	-0.969	1.000	52.4	30.7
250 Degr.	992.9M	0.800	-0.969	1.000	53.4	31.6
260 Degr.	1002.5M	0.800	-0.969	1.000	53.6	31.8
270 Degr.	961.6M	0.800	-0.969	1.000	52.8	31.1
280 Degr.	909.9M	0.800	-0.969	1.000	51.8	30.2
290 Degr.	873.5M	0.800	-0.969	1.000	51.0	29.5
300 Degr.	907.4M	0.800	-0.969	1.000	51.7	30.1
310 Degr.	905.8M	0.800	-0.969	1.000	51.7	30.1
320 Degr.	950.1M	0.800	-0.969	1.000	52.6	30.9
330 Degr.	1037.4M	0.800	-0.969	1.000	54.3	32.4
340 Degr.	1034.5M	0.800	-0.969	1.000	54.2	32.4
350 Degr.	907.5M	0.800	-0.969	1.000	51.7	30.1

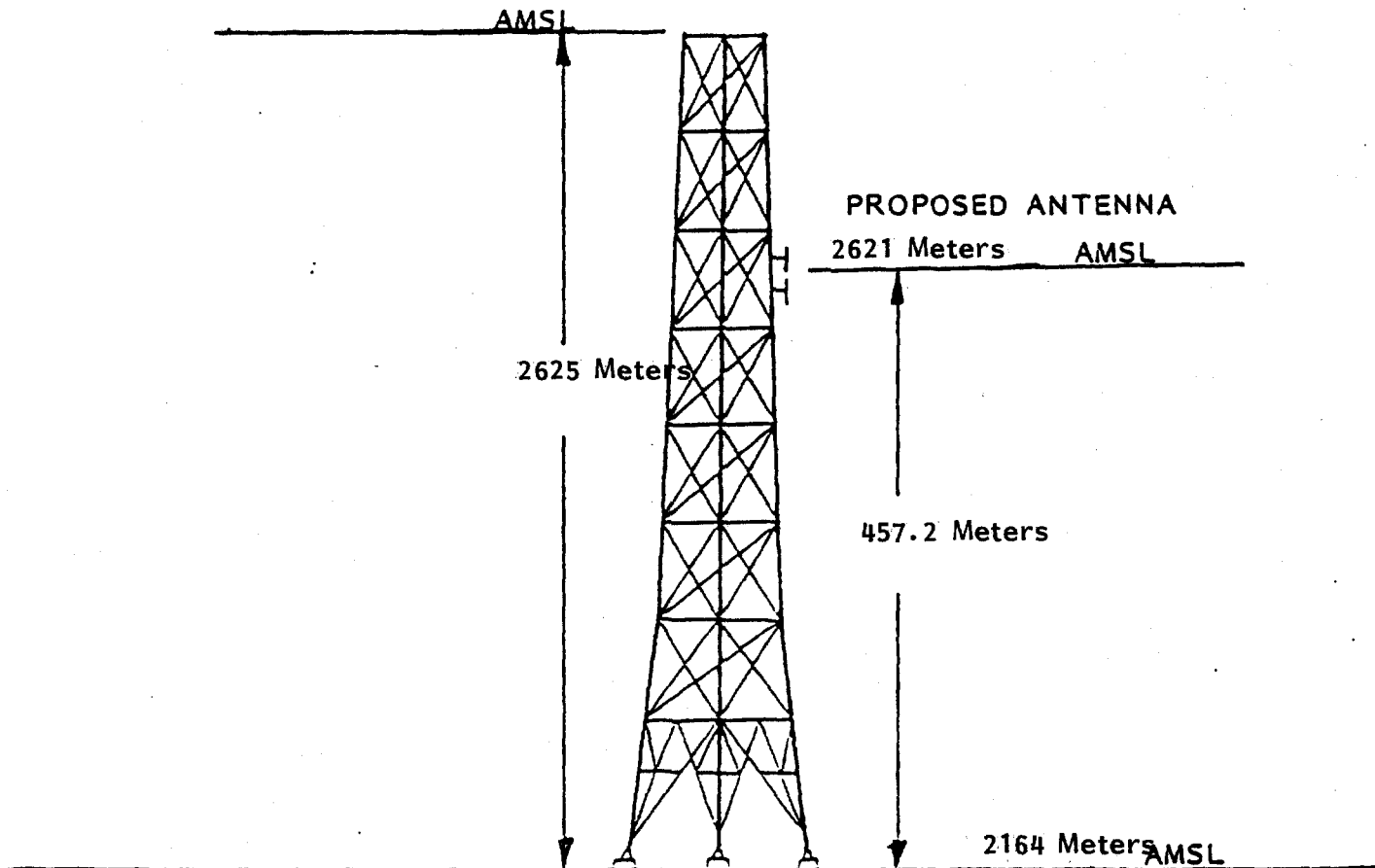
Ave. HAAT= 952.2M, Ant. COR=2621.0M AMSL

TOWER SKETCH KBCH-FM

KINGS BEACH, CALIFORNIA

PROPOSED RULEMAKING CLASS C2

April 1993



KIDD COMMUNICATIONS

KBCH-FM KINGS BEACH, CALIFORNIA

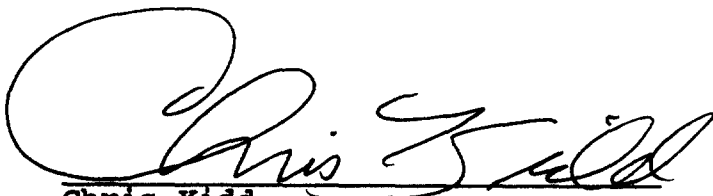
PROPOSED RULEMAKING

CLASS C2

### Permittee Statement

I, Chris W. Kidd, am the owner of Kidd Communications, who is the permittee of KBCH-FM, Kings Beach, California. The exhibits and technical evaluations submitted herein, were performed by me or under my direct supervision.

If the Commission grants the C2 Allocation Request, for KBCH, Kidd Communications will promptly file a 301 upgrade application in response to the report and order, when issued. Additionally, when the Commission issues a C2 Construction Permit for KBCH-FM, Kidd Communications will promptly build KBCH as a class C2 station. In the event that KBCH is operating as a Class C3 at that time, Kidd Communications will modify the facilities of KBCH to conform to a C2 facility as specified and approved from a future 301 application and an FCC Construction Permit.



Chris Kidd  
Owner: Kidd Communications

4-28-93  
Date